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8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 IN RE FACEBOOK BIOMETRIC
13 INFORMATION PRIVACY LITIGATION

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15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS
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**DECLARATION OF JOHN
NADOLENCO**

Master Docket No.: 3:15-CV-03747-JD

Date: June 28, 2018
Time: 10:00 a.m.
Location: Courtroom 11

Hon. James Donato

1 I, John Nadolenco, hereby declare as follows:

2 1. I am an attorney licensed to practice before the courts of the State of California
3 and this Court. I am a partner with the law firm of Mayer Brown LLP, counsel for defendant
4 Facebook, Inc. ("Facebook") in the above-captioned matter.

5 2. I make this Declaration on my own personal knowledge and, if called upon as a
6 witness to do so, I could and would competently testify as to the matters set forth herein.

7 3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' "Subpoena to
8 Appear and Testify at a Hearing or Trial" served on Mr. Zuckerberg on May 14, 2018.

9 4. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' Initial List of
10 Proposed Additional Search Terms, dated August 15, 2016.

11 5. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' Amended
12 Second Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6), dated
13 October 14, 2016.

14 6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the
15 deposition of Yaniv Taigman, dated October 18, 2016.

16 7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the
17 deposition of Omry Yadan, dated October 26, 2017.

18 8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff Carlo Licata's
19 Notice of Rule 30(b)(6) Deposition of Defendant Facebook, Inc., dated December 18, 2015.

20 9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the
21 deposition of Mark Pike, dated February 11, 2016.

22 10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the
23 deposition of Joachim De Lombaert, dated February 12, 2016.

24 11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the
25 deposition of Robert Sherman, dated September 19, 2017.

26 12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the
27 deposition of Dan Barak, dated October 10, 2017.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

/s/ John Nadolenco
John Nadolenco